REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith. The present amendment is being made to facilitate prosecution of the application.

I.   STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 9-15 are pending. Claims 9, 11 and 13 are independent. Claims 9-15 are hereby amended. Support for this amendment is provided throughout the Specification as originally filed. Claims 1-8 have been cancelled without prejudice or disclaimer of subject matter.

No new matter has been introduced by this amendment. Changes to the claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicant is entitled.

II.   REJECTIONS UNDER 35 U.S.C. §102(b) and §103(a)

Claims 9-11 and 13 were rejected under 35 U.S.C. §102(b) as allegedly anticipated by U.S. 2001/0041021 to Boyle.

Claim 12 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Boyle in view of Applecare Document: 122014.

Claim 14 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Boyle in view of Kahn (US 2004/0004737).

Claims 15 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over

Boyle in view of Sesek (US 2003/0076365).

III.   RESPONSE TO REJECTIONS

Claim 18 recites, *inter alia*:

> "…execution program data for said host machine to
> execute **said reproduction program using said**
> **reproduction program data** and **a writing program to**
> **write at least one of said image data and audio data**
> **from said host machine to said storage element** in
> response to a detection signal indicating that said host
> machine detects a connection of said terminal to said
> interface." (Emphasis added)

As understood by Applicant, Boyle relates to synchronization of image data

between a handheld device and a computer.

Applicants submit that Boyle does not teach or suggest the reproduction feature

recited in the pending claims. Indeed, claim 1 specifically recites execution of a reproduction

program using reproduction program data.

Furthermore, claim 1 recites a writing program to write the image data and audio

data.

Applicants submit that Boyle fails to teach or suggest either the reproduction

feature or the writing feature recited in claim 1.

Therefore, Applicants respectfully submit that claim 1 is patentable.

Independent claims 11 and 13 are similar, or somewhat similar, in scope and are

therefore patentable for similar, or somewhat similar, reasons.

IV.   DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.
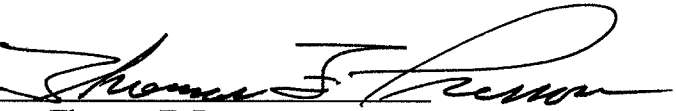
CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, it is respectfully requested that the Examiner specifically indicate those portions of the reference providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Applicants respectfully submit that all of the claims are in condition for allowance and requests early passage to issue of the present application.

Respectfully submitted,

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